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Before the
Federal Communications Commission
Washington, DC 20554

JUL - 8 1997

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In the matter of)
)
Amendment of Part 95 of the)
Commission's Rules to Allow)
Organizational Licensing)
on GMRS)

RM-9107

COMMENTS TO A NOTICE OF PROPOSED RULE MAKING

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1. First my own background and how it relates to these comments. I am an Amateur Extra Class amateur radio operator (N4AOF), Communications Officer for the American Red Cross, Louisville Area Chapter, Southwest Service Center, a member of the Louisville and Jefferson County Radio Amateur Civil Emergency Service (RACES), and a twenty-two year member of REACT (Radio Emergency Associated Communications Teams). I am also secretary of Kentucky Voluntary Organizations Active in Disaster (KyVOAD) and vice president of the Kentucky State REACT Council. I have been actively involved in disaster and emergency communications work ever since a highly informal start when I suddenly became the only contact between the city of Brandenburg Kentucky and the outside world in the immediate aftermath of the infamous April 3rd (1974) tornadoes. I am a former user of two now-expired GMRS organizational licenses (KAD4094 and KAE4097) which were lost as a result of the retroactive rules changes eliminating organizational licensing for GMRS. Thus I have over two decades experience in the specific field of voluntary public service, disaster, and emergency communications, including active usage of CB, GMRS, amateur radio, and various agency-specific radio systems in numerous disaster and emergency situations.

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2. In his petition, Mr. Collier clearly and correctly identifies the current need for some form of low cost, widely available, radio communications which can be used by the numerous organizations involved in disaster and emergency response. He is especially accurate in describing the current *waste* of valuable communications volunteers providing cross-service liaison to permit effective coordination among the many agencies typically involved in disaster response. It is very common to need three or four radio operators at an Emergency Operations Center, two at each Red Cross shelter, two or three at each Mobile Feeding Unit, plus numerous “shadows” assigned to key individuals — and in any situation lasting more than 12 to 24 hours these numbers are *per shift* requirements.

3. Mr. Collier is equally correct in identifying GMRS as the most effective way to meet the needs identified. In all but the very most densely populated metropolitan areas, GMRS is greatly under-utilized. As Mr. Collier points out, the other radio services lack the capabilities and capacity to provide a useful tool for disaster communications. This is particularly true of the critical mid-range distances of 10 to 100 miles which reflect the operational radius of a typical single disaster response site. Amateur HF radio and satellite telephones can provide long distance communications. There are several viable methods for short range communications - including both agency-specific radio systems and various services such as unlicensed 49 MHz, CB, FRS, etc. *But* it is in that critical mid-range distance where the availability of a common system is essential and currently unmet.

4. Allowing limited organizational licensing, as proposed in RM-9107, would not have any harmful effects on existing GMRS licensees. The organizations covered by this proposal are typically not high traffic users – other than in the midst of a catastrophic disaster. If anything, the licensing of such organizations on GMRS will assist existing users of the service. One factor which has limited the usefulness of GMRS as a personal radio service has been the short range of handheld GMRS transceivers without repeaters. The elimination of businesses from GMRS sharply reduced the number of repeaters available in all but the most highly populated areas. Individual GMRS users can rarely afford to purchase, install, and maintain a repeater for their own use. While several

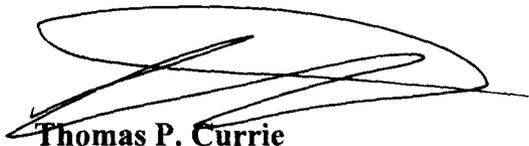
individual licensees could come together to set up a repeater, it is quite difficult to accomplish this in practice. The public service organizations covered by this proposal typically rely on local community volunteers. These organizations would be quite likely to set up repeaters to help meet their anticipated disaster communications requirements – and to make those repeaters available for shared “community repeater” use at other times.

5. I must disagree with two small parts of Mr. Collier’s suggestions for implementing organizational licensing.

a. He proposes that GMRS licenses for public service non-profit organizations should be made more expensive than regular licenses. Quite the contrary, I feel the Commission should continue its long-standing policy of charging 501(c)(3) organizations only the processing fee but no licensing fee whatsoever. Legitimate 501(c)(3) organizations do not need to face an additional financial burden for providing a public service. The IRS already does an adequate job of screening organizations applying for tax exemptions under this section of the tax code. We are not going to be inundated by fictitious or frivolous organizations as long as proof of 501(c)(3) status is a requirement for the organizational license.

b. He also proposes an arbitrary limit on the number of stations to be covered by a license and states that the objective of this limitation is to prevent major national organizations from applying for a single nation-wide license. This is exactly the reason why there should *not* be a limit on the number of stations covered by a single organizational license. Rather than preventing nation-wide licensing, the Commission should *encourage* qualifying national organizations to apply for a single nationwide license, including allowing unspecified repeater locations. This would reduce any processing burden on the FCC and simultaneously enhance the effectiveness of organizational licensing. One of the key advantages of organizational GMRS licensing would be to encourage interoperability between organizations by providing a common radio service. This is best achieved by allowing the key national organizations to request a single license, single call sign, and consistent frequencies.

6. To further support the goal of inter-operability, I would add the suggestion that organizational GMRS licenses available under this rulemaking all be issued for 462.600, 462.675, 467.600, and 467.675 MHz. Such licenses would also cover the interstitial frequencies as already provided in the rules. Note that these frequencies are already available for itinerant GMRS usage for emergency communications. Placing the public service disaster and emergency organizations on these same frequencies is consistent and appropriate.



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